

EIS000706

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**U.S DEPARTMENT OF ENERGY
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR A GEOLOGIC REPOSITORY FOR THE DISPOSAL OF
SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE
AT YUCCA MOUNTAIN, NEVADA**

**STATEMENT OF MYRNA WILLIAMS,
COMMISSIONER
CLARK COUNTY, NEVADA**

**PRESENTED AT THE PUBLIC HEARING
LAS VEGAS, NEVADA
GRANT SAWYER STATE OFFICE BUILDING
JANUARY 11, 2000**

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**STATEMENT OF MYRNA WILLIAMS,
COMMISSIONER, CLARK COUNTY, NEVADA
REGARDING THE DRAFT YUCCA MOUNTAIN
ENVIRONMENTAL IMPACT STATEMENT
PRESENTED AT THE LAS VEGAS, NV PUBLIC HEARING
JANUARY 11, 2000**

My name is Myrna Williams. I am a commissioner in Clark County, Nevada. I am also a member of the state of Nevada commission on nuclear projects, and was for many years a member of the Nevada legislature's high-level radioactive waste committee. I am here tonight to offer comments to a document that concerns me greatly - *the Draft Yucca Mountain Environmental Impact Statement*. Tonight I will provide a summary of major issues. We will be submitting more comprehensive comments and documentation on the **DEIS** prior to the February 9th deadline.

For context I'd like to first describe Clark County. In the nineties Clark County was the fastest growing county in the nation. Growth is projected to continue at high rates well into the future. Clark county is highly urbanized and includes, the cities of Boulder City, Henderson, Las Vegas, North Las Vegas and Mesquite in addition to unincorporated Clark County. There are over 1.3 million residents, or almost 70 percent of Nevada's residents. 1998 census estimates note that we have recently passed New Orleans, Charlotte, N.C. and Salt Lake City metropolitan areas in population.

In addition to resident population our large number of visitors is often ignored when considering impacts. Our tourist-based economy, for example, attracts over 32 million people annually. This is roughly the equivalent to the entire population of the city of Baltimore visiting Las Vegas during an average week during the year.

In 1988, Clark County was designated by the Department of Energy as an "affected unit of local government," under provisions of the Nuclear Waste Policy Act, as amended. This clearly was an acknowledgment by *DOE* that the citizens and community could be impacted by Yucca Mountain Program activities.

Clark County has been an active participant in a full range of Yucca Mountain oversight activities since 1983. The County has produced an extensive number of reports and analyses examining potential impacts to our community and citizenry. To ensure that a broad range of public and geographical concerns were considered, a steering committee was established with seven citizen members, and representatives from the incorporated cities in Clark County, and the Moapa Band of Paiutes.

1... It was recognized by Clark County early on that the *EIS* would be a key document in describing and assessing potential yucca mountain impacts. With this in mind, Clark County provided extensive comments during the *DEIS* scoping in December 1995. In 1998, in response to a request from *DOE* for reference documents, staff provided considerable information that would assist in developing a *DEIS* that would accurately reflect local conditions and concerns.

Despite these considerable efforts on the part of staff and others, almost none of this information was considered or even referenced in the *DEIS*. As a consequence, the *DEIS* ignores a host of important community issues that one could reasonably expect to be considered in a project of this scope and significance. This is particularly disturbing given the major role that Clark County is

given in the transport of the waste. To cite examples.

- The Las Vegas Valley Beltway system currently under construction, is cited as an important link for transporting waste. *It should be noted that the beltway is not incorporated in the federal road network. No federal dollars were utilized in the financing of the beltway*
- Two intermodal transfer sites (Apex-Dry Lake and Sloan-Jean) are in Clark County.
- Potential new rail lines at Jean and at Valley Siding, the latter in the northern part of the Las Vegas Valley, are also in Clark County.
- U.S. 93/95 and Interstate 15 (the Hoover Dam and the "Spaghetti Bowl") routes that have been used as recently as last year for radioactive waste shipments, are also possible routing options.

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Clark County, therefore, is afforded a prominent place in the *DEIS*. Despite this key role there is almost no evaluation of the potential implications of transporting nuclear waste through our urbanized, congested and increasingly developing valley. My major concerns are the following:

- The *NEPA* process requires that "reasonable" impacts from a project be considered. However, there is no recognition of potentially severe impacts to the county are recognized. There was no rationale provided, for example, regarding potential impacts to Clark County's tourist-based economy. (Potential economic impacts go far beyond the mere provision of jobs noted)
- Although the transportation of nuclear waste is a key part of the Yucca Mountain Program, the *DEIS* presents no comparative analyses of transportation impacts from the modes and routing options noted. At a minimum a preferred routing (or mode) should have been selected and evaluated.
- the Department of Energy has long trumpeted the effectiveness of its *Environmental Justice* program. It is curious, then, that the evaluation of effects on minority, low-income and Native-American groups is totally ignored in the *DEIS*. For example, U.S. 95, a major proposed routing option goes through the Las Vegas Paiute reservation. Other routes through the Las Vegas metropolitan area are adjacent to minority and low-income populations. However, there is no recognition of this in the *DEIS*.

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- The *DEIS* also fails to evaluate cumulative impacts associated with other Nevada test site activities. As an example, there is no examination of the probable use of the Nevada Test Site as the disposal site for the nation's low level radioactive waste. This offers the potential to dramatically increase the total numbers of shipments through Clark County and Southern Nevada.

In summary, I would like to pose several questions.

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- In light of Clark County's potential major role in transporting the waste, why weren't potential impacts to tourism and gaming not examined? *This is by far Clark County's and Nevada's most crucial economic sector.*

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- Why wasn't current demographic information for Clark County used in transportation risk analyses (See Appendix J- Page 55)? *The County, as you're probably aware, has increased in population by over one-third since the 1990 census. Utilizing non-current information strongly underestimates risk in those areas where development has occurred over the past decade.*

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- Why was risk was so narrowly defined to exclude situations by which people in everyday life make decisions? What evidence can DOE provide, for example, that property values would not be affected? *A recent DOE study of shipments from foreign research reactors, for example, provides evidence that property values can be negatively affected by nuclear waste shipments. Likewise, a New Mexico Supreme Court decision affirmed that the perception of risk from radioactive waste shipments can result in a reduction in property values.*

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- Why did DOE choose to exclude interaction with Clark County and other affected units of government during *DEIS* development? *Closer coordination would have resulted in more accurate local information for incorporation into the document.*

In closing I would like to offer several recommendations:

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- To address the deficiencies in the *DEIS*, particularly with regard to the transportation of the waste, DOE should consider the preparation of a supplemental environmental impact statement. The lack of a comprehensive analysis of transportation issues strongly suggests that the *DEIS* is an *insufficient document.*

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- Because of the significance of the Yucca Mountain project and its potential impact on communities throughout the United States, we would recommend that DOE prepare a document prior to the finalization of the *DEIS* describing how DOE intends to respond to our concerns.

Clark County will providing more detailed comment prior to the deadline. As an elected official of the county which includes seven of ten Nevada residents, I am looking forward to your response to my specific questions and concerns.